

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NORTHBROOK PARK DISTRICT, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

MR. DAVID'S FLOORING
INTERNATIONAL, LLC, DIVERZIFY+ LLC
f/k/a MR. DAVID'S FLOORING
INTERNATIONAL, LLC, PCI FLORTECH
INC., VORTEX COMMERCIAL FLOORING,
INC., CONSOLIDATED CARPET
ASSOCIATES, LLC, COMMERCIAL
CARPET CONSULTANTS, INC.,
MICHAEL P. GANNON, DELMAR E.
CHURCH, JR., ROBERT A. PATREY, JR., and
KENNETH R. SMITH,

Defendants.

Civil Action No. 20-cv-07538

Hon. Robert M. Dow, Jr.

**PLAINTIFF'S UNOPPOSED MOTION FOR
FINAL APPROVAL OF PROPOSED SETTLEMENT**

Plaintiff Northbrook Park District ("Plaintiff"), by and through its undersigned counsel, hereby moves the Court, pursuant to Federal Rule of Civil Procedure 23, for an Order granting final approval of the proposed class action Settlement¹ as being fair, reasonable, and adequate.

¹ Unless otherwise stated herein, capitalized terms shall have the same meaning as provided in the Parties' Settlement Agreement, which is attached as Exhibit 1 to Plaintiff's Memorandum of Law in Support of Unopposed Motion for Preliminary Approval of Proposed Settlement. Dkt. No. 77-1.

In support of Plaintiff's Motion, Plaintiff incorporates by reference Plaintiff's Memorandum of Law in Support of Unopposed Motion for Final Approval of Proposed Settlement, filed contemporaneously with this Motion. A proposed Final Approval Order, attached to Plaintiff's supporting memorandum as Exhibit 4, is also filed contemporaneously for the Court's consideration. The Court has set a telephonic Fairness Hearing for this Motion as well as Plaintiff's Motion for Approval of Attorneys' Fees, Reimbursement of Expenses and Class Representative Service Award for August 26, 2022 at 9:00 a.m. Central (*see* Dkt. No. 91).

WHEREFORE, Plaintiff respectfully requests that the Court grant its Unopposed Motion for Final Approval of Proposed Settlement, including all requested relief with respect to the proposed Settlement of this class action, and also grant any other such relief as the Court deems appropriate.

Dated: August 12, 2022

Respectfully submitted,

/s/ Michael L. Silverman

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Interim Co-Lead Class Counsel

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing Plaintiff's Unopposed Motion for Final Approval for Proposed Settlement was filed this 12th day of August 2022 via the electronic filing system of the Northern District of Illinois, which will automatically serve all counsel of record.

/s/ Michael L. Silverman
Michael L. Silverman